

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HAYNES INTERNATIONAL, INC., a Delaware corporation)
Plaintiff,	Civil Action No. 04-197(E)
v.) JURY TRIAL DEMANDED
ELECTRALLOY, a Division of G.O. CARLSON, INC., a Pennsylvania corporation	Judge Cohill)
Defendant.	ý

DEFENDANT ELECTRALLOY'S MOTION TO SEAL APPENDIX

Defendant, Electralloy, a division of G.O. Carlson, Inc. ("Electralloy" or "Defendant"), by its undersigned counsel, moves the Court to file the accompanying Defendant's Concise Statement of Undisputed and Material Facts In Support of Its Motion for Summary Judgment and Defendant's Memorandum of Law In Support of Motion for Summary Judgment under seal. Defendant contests the existence of information in its Concise Statement of Material Facts and Memorandum of law that would be subject to designation as "attorneys eyes only" pursuant to the Stipulated Protective Order entered by the Court in this matter on February 17, 2005.

Plaintiff Haynes International, Inc. ("Haynes" or "Plaintiff") believes that these documents should be filed under seal. Consequently, out of an abundance of caution, Defendant respectfully requests that the Court grant this request that its Concise Statement of Material Facts and Memorandum of Law In Support of Defendant's Motion for Summary Judgment be filed under seal, along with Defendant's two volume Appendix, which was submitted to the Court pursuant to a Motion to Seal dated September 27, 2005.

A Proposed Form of Order is attached hereto.

Respectfully submitted,

BLANK ROME LLP

Dated: September 28, 2005

Timothy I. Pecsenye PA I.D. 51339

BLANK ROME LLP One Logan Square Philadelphia, PA 19103-6998 (215) 569-5500 Counsel for Defendant,

Electralloy, a division of G.O. Carlson, Inc

Emily Barnhart, Esquire PA I.D. 84895 Jennifer L. Miller, Esquire PA I.D. 91808 BLANK ROME LLP One Logan Square Philadelphia, PA 19103

CERTIFICATE OF SERVICE

I, Emily J. Barnhart, hereby certify that on this 28th day of September, 2005, a true and correct copy of the foregoing MOTION TO SEAL was served on the attorneys for Plaintiff by Federal Express, addressed as follows:

Lynn J. Alstadt, Esquire Bryan H. Opalko, Esquire BUCHANAN INGERSOLL PC One Oxford Centre 301 Grant Street Pittsburgh, Pennsylvania 15219

EMPLY J. BARNHART